

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Tipton, Mangum and Eldorado, Oklahoma))

MM Docket No.99-23
RM - 9423

RECEIVED
MAR 30 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

REPLY COMMENTS

WBAP/KSCS Operating, Ltd. ("WBAP") and Blue Bonnet Radio, Inc. ("BBRI"), by their counsel, and pursuant to Section 1.415 of the Commission's Rules, hereby submit these reply comments in response to the "Comments and Counterproposal of Texas Grace Communications" ("TGC") in the above-captioned proceeding. Due to a conflict between the counterproposal filed in this proceeding by TGC and an earlier counterproposal filed by WBAP/BBRI in a different proceeding, as described below, the TGC Counterproposal is not acceptable for consideration insofar as it proposes an alternate channel for Tipton, Oklahoma. In support hereof, WBAP/BBRI state as follows:

I. BACKGROUND

1. The Notice of Proposed Rule Making ("NPRM") (released January 22, 1999), proposed to allot Channel 249C2 to Tipton as its first local service, which would require (i) changing Station KHIM, Mangum, Oklahoma from Channel 249A to Channel 282A, and (ii) changing the unused allotment at Eldorado, Oklahoma from Channel 246A to Channel 245A. TGC, permittee of KRZB, Archer City, Texas, filed a counterproposal proposing instead to (1) substitute Channel 275C2 for Channel 249C2 at Tipton; (2) upgrade Station KRZB at Archer City from Channel 248C2 to Channel

248C1 and move the transmitter site approximately 20 km west, and (3) allot Channel 282C3 to Granite, Oklahoma as its first local service.

II. CHANNEL 275C2 IS NOT AVAILABLE TO BE ALLOTTED TO SINCE THAT ALLOTMENT WOULD CONFLICT WITH FILED PROPOSAL TO ALLOT CHANNEL 272C1 TO WICHITA FALLS, TEXAS.

2. As an initial matter, TGC is incorrect in asserting that Channel 275C2 can be allotted to Tipton. Channel 275C2 at Tipton conflicts with a counterproposal filed by WBAP/BBRI on December 21, 1998 in Cross Plains, Texas, et. al., MM Docket No. 98-198. In that counterproposal, WBAP/BBRI proposed to allot Channel 276A for Channel 272A at Vernon, Texas. As Exhibit E, Figure 1 demonstrates, the allotment of 275C2 at Tipton is in conflict with the allotment of 276A at Vernon. Since TGC's Tipton proposal is in conflict with a proposal made in the Cross Plains, Texas proceeding, it can only be considered by the Commission in the context of that proceeding. However, the deadline for filing comments in Cross Plains, Texas expired on December 21, 1999. Therefore, TGC's proposal to allot Channel 275C2 to Tipton is unacceptable for consideration here. See e.g., Wellington, Texas 13 FCC Rcd 4454 (1998), recons. den. (DA 98-2656, rel. 1/8/99).

III. CHANNEL 282C3 CAN BE ALLOTTED TO GRANITE, OKLAHOMA CONSISTENT WITH THE NPRM THROUGH THE SUBSTITUTION OF A DIFFERENT CHANNEL AT MANGUM, OKLAHOMA.

3. TGC also proposes the allotment of Channel 282C3 to Granite, Oklahoma as that community's first local service. TGC states that this proposed new allotment at Granite is dependent on the substitution of Channel 275C2 at Tipton in place of the NPRM proposal to use Channel 249C2. As discussed above, Channel 275C2 is not available at Tipton. However, both the Granite and Tipton proposals can be granted, and the conflict between the two removed, through the substitution of Channel 259A for Channel 249A for Station KHIM(FM), Mangum, Oklahoma. See Exhibit E, Figures 2 and 3. In resolving the conflict for Granite in this way, both Granite and Tipton can receive a first local service.

IV. TGC'S PROPOSAL TO RELOCATE AND UPGRADE STATION KRZB, ARCHER CITY, TEXAS ON CHANNEL 248C1 CONFLICTS WITH THE NPRM PROPOSAL TO ALLOT CHANNEL 248C2 TO TIPTON, AND THE COMMISSION MUST GRANT THE TIPTON ALLOTMENT UNDER ITS ESTABLISHED PRIORITIES.

4. Since Channel 275C2 is unavailable at Tipton, TGC's proposal to relocate and upgrade Station KRZB, on Channel 248C1 is in conflict with the proposal in the NPRM to allot channel 248C2 to Tipton. However, as between the two proposals, the Commission must favor the Tipton proposal since it results in a first local service, (Priority 3), whereas the Archer City upgrade merely increases its secondary service area (Priority 4). See Revision of FM Allotment Policies and Procedures, 90 FCC 2d 88 (1982).

5. On February 17, 1999, TGC filed an application for Channel 248C2 at Archer City at a new site which is north of the allotment reference point established in MM Docket 97-225 (BMPH-990217IB). This site conflicts with the proposal for Channel 249C2 at Tipton. However, the application site does not provide a 70 dBu signal to all of Archer City, Texas. See Engineering Statement. Although applications are permitted to cover 80% of a community, to be considered as a counterproposal, the site must meet the Commission's allocation standards. See, e.g., Cloverdale, Alabama et. al., 10 FCC Rcd 13630 (1995); recons. den. 12 FCC Rcd 2090 (1997) and Tylertown, Mississippi, (DA 99-531 rel. 3/19/99) at note 3. Furthermore if compared to a first local service at Tipton (Priority 3) the Class C2 site for Archer City would be treated under Priority 4. See Revision of FM Assignment Policies and Procedures, *supra*.

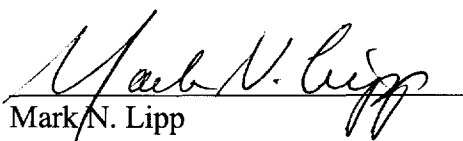
V. CONCLUSION

6. The Commission should allot channel 248C2 to Tipton, Oklahoma as that community's first local service, as proposed in the NPRM, and it should allot Channel 282C3 to Granite, Oklahoma as that community's first local service, with the substitution of Channel 259A for 249A at Mangum, Oklahoma. The proposal of TGC for Channel 248C1 cannot be accommodated with a substitute

channel at Tipton. As a counterproposal, the Class C1 upgrade at Archer City is of a lower priority than a first local service at Tipton. The Class C2 application site for KRZB, Archer City is unacceptable as a counterproposal because it does not provide a 70 dBu signal over all of Archer City. Regardless, the Class C2 application site is also of a lower priority than a first local service at Tipton.

Respectfully submitted,

WBAP/KSCS OPERATING, LTD.
BLUE BONNET RADIO, INC.

A handwritten signature in cursive script, appearing to read "Mark N. Lipp", is written over a horizontal line.

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Their Counsel

March 30, 1999

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ENGINEERING STATEMENT

IN SUPPORT OF

REPLY COMMENTS

**MM Docket 99-23
Blue Bonnet Radio, Inc.
WBAP/KSCS Operating Ltd.**

Prepared by

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March 30, 1999

Engineering Statement
In Support of
Reply Comments
MM Docket 99-23, RM-9423
WBAP/KSCS Operating, Ltd.
Blue Bonnet Radio, Inc.

General

The instant reply comments were prepared for Blue Bonnet Radio, Inc. ("Blue Bonnet") and WBAP/KSCS Operating, Ltd. ("WBAP") and submitted in response to a counterproposal filed by Texas Grace Communications ("Texas Grace"), permittee of KRZB(FM), Archer City, Texas in MM Docket 99-23.

The NPRM for this Docket (DA 99-216) sought public comments concerning the allotment of channel 249C2 at Tipton, Oklahoma as that community's first local service. Texas Grace's counterproposal offered certain options that proposed the substitution of channel 275C2 for channel 249C2 at Tipton and the upgrade of KRZB at Archer City from channel 248C2 to channel 248C1. This proposal is conceptually flawed due to conflicts with a Blue Bonnet/WBAP counterproposal that was timely filed December 21, 1998. The conflict can be understood, since at the time of Texas Grace's filing, the Blue Bonnet/WBAP counterproposal did not appear in the Commission's technical database. However, this does not eliminate the fact that the use of channel 275C2 at Tipton is not permissible due to short-spacing that this allotment would create to the timely filed Blue Bonnet/WBAP counterproposal. Some elements of the Texas Grace counterproposal are not in conflict with Blue Bonnet/WBAP and therefore can be considered by the Commission.

Methods

The Blue Bonnet/WBAP reply is presented in sections, with each channel or licensed facility where changes in conflict are discussed individually. All sections begin with an allocation or channel spacing study. The proposed modification's technical compliance is then supported by additional exhibits.

All searches were performed on a V-Soft SearchFM program and verified with the EDX FMSR search program. The FCC F(50,50) contours were calculated using SoftWright's Terrain Analysis Package (TAP) Version 4.00.282. The studies were based on the latest technical data from the Commission's databases. Mapping, population counts, and gain/loss areas were conducted by a professional mapping program from MapInfo Corporation, Version 5.0. The program contains the exact community boundaries of the relevant cities. In pertinent cases where community boundaries were critical, the boundaries were cross-checked with the U.S. Census Bureau's TIGER maps.

Only the Blue Bonnet/WBAP spectrum modifications in MM Docket 98-198 that directly relate to conflicts created by the Texas Grace counterproposal are discussed in the instant Reply Comments.

Nature of the Blue Bonnet/WBAP Reply Comments

In MM Docket 98-198 Blue Bonnet/WBAP filed a counterproposal that sought to delete channel 277C2 at Commerce, Texas and allocate channel 277C at Allen, Texas for use by KEMM. In order to accomplish this, various channels and licensed facilities were proposed to be modified in order to create compliance with §73.207. The Blue Bonnet/WBAP proposed modifications that directly conflicts with the Texas Grace counterproposal are as follows:

KVWC - channel 276A, Vernon, Texas. Presently KVWC operates on channel 272A licensed to Vernon, Texas. The upgrade of KEMM would create short-spacing to the licensed facility of KWFS, channel 277C1 at Wichita Falls, Texas of 118.64 kilometers. Blue Bonnet/WBAP proposed to eliminate this short-spacing by substituting channel 272C1 at Wichita Falls for channel 277C1 at a new antenna site. However, this substitution required sub-changes, among which was KVWC at Vernon, Texas on channel 272A. Blue Bonnet/WBAP proposed to change KVWC to channel 276A in order to allow the proposed changes at Wichita Falls. As a result of the proposed allotment of channel 276A at Vernon, Texas Grace's proposed allotment of channel 275C2 at Tipton creates 50.99 kilometers of short-spacing. Even if a clear spacing window for the allotment of channel 275C2 existed in the Tipton area, the allotment would not satisfy §73.315, because such a window would be more than 32.6 kilometers from the reference coordinates of Tipton. However, the most important factor is that both Granite and Tipton can receive first local services without conflicting with the timely filed Blue Bonnet/WBAP counterproposal in MM Docket 98-198.

Texas Grace Counterproposal Options

The entire Texas Grace counterproposal does not of necessity require dismissal. The allotment of channel 249C2 at Tipton does not eliminate the possibility of Granite, Oklahoma receiving a new FM service on channel 282C3. The Texas Grace counterproposal sought to provide service to Granite on channel 282C3 which conflicts with the Tipton proposal to substitute channel 282A at Mangum. The Commission may grant channel 282C3 at Granite by substituting channel 259A for channel 249A at the licensed site of KHIM, Mangum, Oklahoma.

Additional Texas Grace Deficiencies

The application site (BMPH-990217IB) for KRZB on channel 248C2 presently on file at Archer City has serious short-spacing problems which prohibit it from being considered as a counterproposal here. A grant of a construction permit to KRZB at its present application site would create a prohibited short-space to channel 249C2 at Tipton of 14.62 kilometers. In addition, the proposed allotment of channel 248C1 for channel 248C2 (without the Tipton substitute channel) creates a short-space of 38.15 kilometers to channel 249C2 at Tipton. Neither of these short-spacings is allowable under current Commission Rules. Finally, the class C2 application at Archer City cannot be treated as a counterproposal in MM Docket 99-23, because the Allocations Branch does not permit waivers of the 70-dBu coverage of less than 100% of the community of license. The Texas Grace application meets the FM Branch's 80% rule but does not meet the Allocation Branch's 100% rule for its proposed allotment of channel 248C2 at Archer City (at its application site).

EXHIBITS EXPLAINED

KVWC

Exhibit E, Figure 1 is an allocation study on channel 276A using the licensed site of KWVC as reference. The study depicts the short-spacing to KWFS in Wichita Falls on channel 277C1 that is eliminated when channel 272C1 is substituted for KWFS. In addition, the study depicts the short-spacing that would be created by the allocation of channel 275C2 at Tipton. Since the Texas Grace counterproposal for channel 275C2 at Tipton is untimely filed in MM Docket 98-198, it cannot be considered in MM Docket 99-23. There are no other fully spaced channels available for substitution at the licensed

site of KVWC. Therefore, under no circumstances is channel 275C2 available for allotment at Tipton.

KHIM

Exhibit E, Figure 2 is an allocation study for channel 259A at Mangum, Oklahoma using the licensed site of KHIM as reference. This fully spaced substitution will allow the allotment of channel 249C2 at Tipton and channel 282C3 at Granite, Oklahoma.

AD282C3

Exhibit E, Figure 3 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 282C3 at Granite, Oklahoma. This allotment is short-spaced to AD282A at Mangum, Oklahoma by 126.42 kilometers. However, this short-space can be eliminated by substituting channel 259A in lieu of channel 282A at the licensed site of KHIM, Mangum, Oklahoma. Note should be given that this allotment does not conflict with the Blue Bonnet/WBAP counterproposal of channel 280A for channel 273A at the licensed site of KQXC at Wichita Falls.

KRZB

Exhibit E, Figure 4 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 248C1 at the proposed Texas Grace site for KRZB, Archer City, Texas. The study demonstrates short-spacing to the proposed allotment of channel 249C2 at Tipton of 38.15 kilometers. Since channel 275C2 is not available for allotment at Tipton, the proposed allotment of channel 249C2 must remain. Therefore, the Texas Grace use of channel 248C1 at Archer City creates prohibited short-space.

Conclusion

Based on the engineering data presented herein, it is apparent that the Texas Grace counterproposal is in conflict with the timely filed counterproposal of Blue Bonnet/WBAP in MM Docket 98-198. The Texas Grace use of channel 275C2 at Tipton is severely short-spaced to the Blue Bonnet/WBAP use of channel 276A at Vernon, Texas. Therefore, channel 275C2 at Tipton cannot be considered. However, the Commission can grant a first local service to Granite, Oklahoma on channel 282C3 as proposed by Texas Grace. This will not be in conflict with any of the substitutions proposed by Blue Bonnet/WBAP in its counterproposal filed December 21, 1998. This channel can be allocated to Granite and not be in conflict with channel 249C2 at Tipton. Substituting channel 259A at the licensed site of KHIM, Mangum, Oklahoma, for channel 249A in lieu of the initially proposed channel 282A will accomplish this. Even though the proposed upgrade of KRZB to channel 248C1 at Archer City is not in direct conflict with the Blue Bonnet/WBAP counterproposal, it is in conflict with the use of channel 249C2 at Tipton and must be compared under the Commission's priorities.

ENGINEERING CERTIFICATION

My education and qualifications are a matter of record before the Commission. This firm has filed numerous applications, forms and petitions with the Commission for a period of 21 years. I am familiar the Commission's Rules and Regulations, and those rules were followed during the preparation of this counterproposal.

All engineering in the instant Reply Comments (MM Docket 99-23) was prepared by me or under my direct supervision.

Respectfully submitted,
REYNOLDS TECHNICAL ASSOCIATES

A handwritten signature in black ink, appearing to read "Paul Reynolds", with a stylized flourish at the end.

Paul Reynolds,
Technical Consultant to
WBAP/KSCS OPERATING, LTD.
BLUE BONNET RADIO, INC.

March 29, 1999

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**ENGINEERING STATEMENT
In Support of**

**REPLY COMMENTS
MM Docket 99-23, RM-9423**

**Blue Bonnet Radio, Inc.
WBAP/KSCS Operating Ltd.**

**Allocation Study – Substitution of Channel 276A at Vernon, Texas
(Using the Licensed Coordinates of KWVC as Reference)**

| | | | | | | | |
|--|--------------|----------------------|-----------|------------------------|--------------|--------------|---------------|
| 34 09 12 N. | | | | Class A | | | Search Date |
| 99 16 09 W. | | | | Current rules spacings | | | 03-30-99 |
| ----- Channel 276A -103.1 MHz ----- | | | | | | | |
| Call | Ch# | City | State | Bear' | Dist' | R'grd | Margin |
| ----- | | | | | | | |
| KWFSFM | 277C1 | Wichita Falls | TX | 113.0 | 72.92 | 133.0 | -60.08 |
| Of No Concern: | | | | | | | |
| Proposed Channel Change to Channel 272C1 | | | | | | | |
| in Blue Bonnet/WBAP Counterproposal | | | | | | | |
| AD275 | 275C2 | Tipton | OK | 2.9 | 55.01 | 106.0 | -50.99 |
| Of Concern: | | | | | | | |
| Short-Space Created by the | | | | | | | |
| Proposed Texas Grace Allocation | | | | | | | |
| Of channel 275C2 at Tipton | | | | | | | |
| KQXC | 273A | Wichita Falls | TX | 109.9 | 68.81 | 31.0 | 37.81 |
| KRPTFM | 278C | Anadarko | OK | 23.2 | 149.04 | 95.0 | 54.04 |
| Of Note: | | | | | | | |
| Proposed Modification to KRPT | | | | | | | |
| In MM Docket 99-23 Counterproposal | | | | | | | |
| ALOPEN | 223A | Hollis | OK | 314.7 | 83.56 | 10.0 | 73.56 |
| AD278 | 278C3 | Wellington | TX | 309.6 | 115.97 | 42.0 | 73.97 |
| ALOPEN | 278C3 | Wellington | TX | 309.6 | 115.97 | 42.0 | 73.97 |
| ----- | | | | | | | |

**ENGINEERING STATEMENT
In Support of**

**REPLY COMMENTS
MM Docket 99-23, RM-9423**

**Blue Bonnet Radio, Inc.
WBAP/KSCS Operating Ltd.**

**Allocation Study – Substitution of Channel 259A at Mangum, Oklahoma
(Using the Licensed Coordinates of KHIM as Reference)**

| | | | | | | | |
|--------------------------|-------|---------------|------------------------|--------|--------|-------------|--------|
| 34 52 27 N. | | | Class A | | | Search Date | |
| 99 30 04 W. | | | Current rules spacings | | | 03-30-99 | |
| ----- | | | Channel | 259A - | 99.7 | MHz | ----- |
| Call | Ch# | City | State | Bear' | Dist' | R'qrd | Margin |
| ----- | | | ----- | | | | |
| Community of Mangum | | | OK | 341.3 | 0.55 | | |
| Reference Coordinates: | | | | | | | |
| North Latitude: 34-52-44 | | | | | | | |
| West Longitude: 99-30-11 | | | | | | | |
| ----- | | | ----- | | | | |
| KBZQ | 258C3 | Lawton | OK | 109.7 | 92.68 | 89.0 | 3.68 |
| KJCM.C | 262C3 | Snyder | OK | 124.9 | 46.56 | 42.0 | 4.56 |
| KLUR | 260C1 | Wichita Falls | TX | 140.7 | 139.56 | 133.0 | 6.56 |
| KXLS | 259C1 | Alva | OK | 30.5 | 221.44 | 200.0 | 21.44 |
| DE259 | 259C1 | Alva | OK | 30.5 | 221.44 | 200.0 | 21.44 |
| AD259 | 259C3 | Tuttle | OK | 74.1 | 169.27 | 142.0 | 27.27 |
| KCDL | 257A | Cordell | OK | 42.9 | 63.46 | 31.0 | 32.46 |
| KCDL.C | 257C3 | Cordell | OK | 36.4 | 78.90 | 42.0 | 36.90 |
| ----- | | | ----- | | | | |

**ENGINEERING STATEMENT
In Support of**

**REPLY COMMENTS
MM Docket 99-23, RM-9423**

**Blue Bonnet Radio, Inc.
WBAP/KSCS Operating Ltd.**

**Allocation Study – Allocation of Channel 282C3 at Granite, Oklahoma
(Using the Proposed Texas Grace Coordinates as Reference)**

| | | | | | | | |
|---|------------------------|---------------|------------------------|-------------|--------|-------|---------|
| 34 57 38 N. | Class C3 | | | Search Date | | | |
| 99 22 00 W. | Current rules spacings | | | 03-30-99 | | | |
| ----- | | | Channel 282 -104.3 MHz | ----- | | | |
| Call | Ch# | City | State | Bear' | Dist' | R'grd | Margin |
| ----- | | | | | | | |
| AD282 | 282A | Mangum | OK | 232.0 | 15.58 | 142.0 | -126.42 |
| Of No Concern: | | | | | | | |
| Proposed Substitution for Channel 259A | | | | | | | |
| In Blue Bonnet/WBAP Counterproposal | | | | | | | |
| | | | | | | | |
| KQFX | 282C1 | Borger | TX | 284.2 | 211.01 | 211.0 | 0.01 |
| KMGL | 281C | Oklahoma City | OK | 69.1 | 183.00 | 176.0 | 7.00 |
| KYYI | 284C | Burkburnett | TX | 155.0 | 106.14 | 96.0 | 10.14 |
| AD283 | 283C1 | Mooreland | OK | 4.7 | 155.41 | 144.0 | 11.41 |
| KRPTFM | 279C1 | Anadarko | OK | 91.3 | 90.51 | 76.0 | 14.51 |
| ALOPEN | 282C2 | Olney | TX | 167.1 | 206.46 | 177.0 | 29.46 |
| KYYI.C | 284C1 | Burkburnett | TX | 155.0 | 106.14 | 76.0 | 30.14 |
| ALOPEN | 229A | Cordell | OK | 43.2 | 50.15 | 12.0 | 38.15 |
| KYYI | 284C | Burkburnett | TX | 147.0 | 134.73 | 96.0 | 38.73 |
| KRKZ | 228C2 | Altus | OK | 192.1 | 59.19 | 17.0 | 42.19 |
| KQXC | 280A | Wichita Falls | TX | 147.0 | 134.73 | 42.0 | 92.73 |
| Of Note: | | | | | | | |
| Proposed Substitution Shown of | | | | | | | |
| Channel 280A for Channel 273A at KQXC's | | | | | | | |
| Licensed Site | | | | | | | |

**ENGINEERING STATEMENT
In Support of**

**REPLY COMMENTS
MM Docket 99-23, RM-9423**

**Blue Bonnet Radio, Inc.
WBAP/KSCS Operating Ltd.**

**Allocation Study – Allocation of Channel 248C1 at Archer City, Oklahoma
(Using the Proposed Texas Grace Allotment Coordinates as Reference)**

| | | | | | | | |
|--|--------------|--------------------|------------------------|--------------|---------------|--------------|----------------|
| 33 35 38 N. | | | Class C1 | | | | Search Date |
| 98 51 18 W. | | | Current rules spacings | | | | 03-30-99 |
| ----- Channel 248 - 97.5 MHz ----- | | | | | | | |
| Call | Ch# | City | State | Bear' | Dist' | R'qrd | Margin |
| ----- | | | | | | | |
| ALOPEN | 248C2 | Archer City | TX | 90.2 | 21.32 | 224.0 | -202.68 |
| Of No Concern: | | | | | | | |
| Allocation Site for CH248C2 at Archer City | | | | | | | |
| KRZB.C | 248C2 | Olney | TX | 156.2 | 27.28 | 224.0 | -196.72 |
| Of No Concern: | | | | | | | |
| CP Site for CH248C2 at Olney, Texas | | | | | | | |
| KRZB.A | 248C2 | Archer City | TX | 50.4 | 38.73 | 224.0 | -185.27 |
| Of No Concern: | | | | | | | |
| Application Site for CH248C2 at Archer City, Texas | | | | | | | |
| AD249 | 249C2 | Tipton | OK | 336.1 | 119.85 | 158.0 | -38.15 |
| Of Concern: | | | | | | | |
| Short-Spacing to Allotment of CH249C2 | | | | | | | |
| At Tipton, Oklahoma | | | | | | | |
| KLAK | 248C2 | Durant | OK | 87.2 | 224.00 | 224.0 | 0.00 |
| KEASFM | 249A | Eastland | TX | 176.7 | 133.02 | 133.0 | 0.02 |
| KEASFM | 249A | Eastland | TX | 176.7 | 133.02 | 133.0 | 0.02 |
| AD249 | 249C3 | Healdton | OK | 58.5 | 148.03 | 144.0 | 4.03 |
| KWTXFM | 248C | Waco | TX | 149.9 | 289.31 | 270.0 | 19.31 |
| KWTXFM | 248C | Waco | TX | 149.9 | 289.31 | 270.0 | 19.31 |
| KWTXFM | 248C | Waco | TX | 150.1 | 290.53 | 270.0 | 20.53 |
| KHIM | 249A | Mangum | OK | 337.3 | 153.98 | 133.0 | 20.98 |
| DE249 | 249A | Mangum | OK | 337.3 | 153.98 | 133.0 | 20.98 |
| KGKLFM | 248C1 | San Angelo | TX | 212.2 | 274.88 | 245.0 | 29.88 |
| KJMZ | 251C1 | Lawton | OK | 22.7 | 119.90 | 82.0 | 37.90 |
| KWEYFM | 247C1 | Weatherford | OK | 3.0 | 217.34 | 177.0 | 40.34 |
| ----- | | | | | | | |

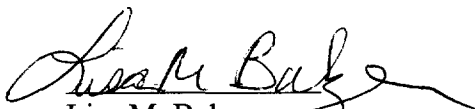
CERTIFICATE OF SERVICE

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy & Bacon, do hereby certify that I have on this 30th day of March, 1999 caused to be mailed by first class mail, postage prepaid, copies of the foregoing **"Reply Comments of WBAP/KSCS Operating, Ltd. and Blue Bonnet Radio, Inc."** to the following:

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